

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK *ex rel.* TZAC, INC.

Plaintiff-Relator,

v.

NEW ISRAEL FUND,

Defendant.

**No. 1:20-cv-2955-GHW**

**DECLARATION OF J. EMMETT MURPHY**

J. Emmett Murphy hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney with the law firm of King & Spalding LLP, which represents Defendant New Israel Fund (NIF) in the above-captioned action. I respectfully submit this Declaration in Support of NIF's Motion to Dismiss the Complaint.<sup>1</sup>

2. The Complaint refers to or discusses events reported in the following documents, which are in the public domain and subject to the New York False Claims Act's "public disclosure bar," *see* N.Y. Fin. Law § 190(9)(b):

**"A" Exhibits**

3. **NIF "Financials":** The *Financials* page of the NIF website, available at <https://www.nif.org/about/annual-report-financials/>

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<sup>1</sup> Defendant New Israel Fund's Notice of Removal Pursuant to 28 U.S.C. § 1331 (Federal Question Jurisdiction), ECF No. 1, Ex. B.

which contains hyperlinks to NIF’s federal “Form 990” tax documents and NIF’s annual financial statements for years 2008 through 2018. A true and correct copy of the page is attached as Exhibit A1. *See* Compl. ¶¶ 8–19 (Form 990s); *id.* ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**4. NIF 2018 Financial Report:** New Israel Fund and Truth to Power Foundation’s *Combined Financial Statements for the Year Ended December 31, 2018 with Summarized Financial Information for 2017*, which is available at

<https://www.nif.org/wp-content/uploads/2019/06/NIF-2018-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2018-funding-for-31-political-advocacy-ngos/>

(*see* Ex. E2). A true and correct copy of the page is attached as Exhibit A2. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**5. NIF 2017 Financial Report:** New Israel Fund’s *Financial Statement for the Year Ended December 31, 2017 with Summarized Financial Information for 2016* (published June 2018), which is available at

<https://www.nif.org/wp-content/uploads/2018/06/NIF-2017-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2017-funding-for-30-political-advocacy-ngos/>

(*see* Ex. E3). A true and correct copy of the document is attached as Exhibit A3. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**6. NIF 2016 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2016 with Summarized Financial Information for 2015* (published August 2017), which is available at

<https://www.nif.org/wp-content/uploads/2017/08/NIF-2016-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/reports/nif-2016-funding-for-political-ngos/>

(see Ex. E4). A true and correct copy of the document is attached as Exhibit A4. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**7. NIF 2015 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2015 with Summarized Financial Information for 2014* (published July 2016), which is available at

<https://www.nif.org/wp-content/uploads/2016/07/NIF-2015-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2015-funding-for-25-political-advocacy-ngos/>

(see Ex. E5). A true and correct copy of the document is attached as Exhibit A5. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**8. NIF 2014 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2014 with Summarized Financial Information for 2013* (published August 2015), which is available at

<https://www.nif.org/wp-content/uploads/2015/08/NIF-2014-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

[https://www.ngo-monitor.org/reports/changes\\_in\\_nif\\_grants\\_few\\_changes\\_in\\_demonization\\_funding/](https://www.ngo-monitor.org/reports/changes_in_nif_grants_few_changes_in_demonization_funding/)

(see Ex. E6). A true and correct copy of the document is attached as Exhibit A6.

See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**9. NIF 2013 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2013 with Summarized Financial Information for 2012* (published May 2014), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/NIF-2013-Audited-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A7. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**10. NIF 2012 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2012 with Summarized Financial Information for 2011* (published April 2013), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/145741062-NIF-2012-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A8. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**11. NIF 2011 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2011 with Summarized Financial Information for 2010* (published May 2012), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/102967801-NIF-2011-Financial-Statements.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A9. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**12. NIF 2010 Financial Report:** New Israel Fund's *Financial Statements for the Year Ended December 31, 2010 with Summarized Financial Information for 2009* (published June 2011), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/NIF-2010-Financial-Statements-Final.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A10. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**13. NIF 2009 Financial Report:** New Israel Fund and Signing Anew's *Combined Financial Statements for the Year Ended December 31, 2009 with Summarized Financial Information for 2008* (published July 2010), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/NIF-09-Combined-FS.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A11. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**14. NIF 2008 Financial Report:** New Israel Fund and Signing Anew’s *Combined Financial Statements for the Year Ended December 31, 2008 with Summarized Financial Information for 2007* (published June 2009), which is available at

<https://www.nif.org/wp-content/uploads/2015/04/nif-08-fs.pdf>

and has been republished via hyperlink at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

(see Ex. E12). A true and correct copy of the document is attached as Exhibit A12. See Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**15.** An article by NIF entitled *Kahanism Has No Place in the Knesset* (March 7, 2019), available at

<https://www.nif.org/stories/human-rights-democracy/kahanism-has-no-place-in-the-knesset/>

a true and correct copy of which is attached as Exhibit A13. See Compl. ¶¶ 23, 24, 26.

### **“B” Exhibits**

**16. IRS Form 990 Downloads:** The Internal Revenue Service (IRS) web page through which any member of the public can download Form 990 filings, including those of NIF. The page is available at

<https://www.irs.gov/charities-non-profits/form-990-series-downloads>

and a true and correct copy of the page is attached as Exhibit B1. See Compl. ¶¶ 8–19 (Form 990s).

**17. IRS Tax Exempt Organization Search:** The IRS search database through which any member of the public can look up registered § 501(c)(3) charities, including NIF. The page is available at

<https://apps.irs.gov/app/eos/>

and a true and correct copy of the page is attached as Exhibit B2. *See* Compl. ¶¶ 8–19 (Form 990s).

**18. IRS Report of New Israel Fund:** The page of the IRS’s “Tax Exempt Organization Search” database dedicated to NIF. The page is available at

<https://apps.irs.gov/app/eos/displayAll.do?dispatchMethod=displayAllInfo&Id=1413537&ein=942607722&country=US&deductibility=all&dispatchMethod=searchAll&isDescending=false&city=&ein1=&postDateFrom=&exemptTypeCode=al&submitName=Search&sortColumn=orgName&totalResults=1&names=New+Israel+Fund&resultsPerPage=25&indexOfFirstRow=0&postDateTo=&state=All+States>

and a true and correct copy of the page is attached as Exhibit B3. *See* Compl. ¶¶ 8–19 (Form 990s).

### **“C” Exhibit**

**19. Charity Navigator Profile:** An online profile on NIF maintained by the watchdog group “Charity Navigator.” The page is available at

<https://www.charitynavigator.org/index.cfm?bay=search.irs&ein=942607722>

and a true and correct copy of the page is attached as Exhibit C. *See* Compl. ¶¶ 8–19 (Form 990s); *id.* ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

### **“D” Exhibits**

**20. ProPublica Profile:** An online profile of NIF maintained by the watchdog group “ProPublica.” The page is available at

<https://projects.propublica.org/nonprofits/organizations/942607722>

and a true and correct copy of the page is attached as Exhibit D1. *See* Compl. ¶¶ 8–19 (Form 990s); *id.* ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**21. NIF 2017 Form 990:** New Israel Fund’s Form 990 for tax year 2017. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/12\\_2018\\_prefi\\_xes\\_94-95%2F942607722\\_201712\\_990\\_2018121816021402](https://projects.propublica.org/nonprofits/display_990/942607722/12_2018_prefi_xes_94-95%2F942607722_201712_990_2018121816021402)

and a true and correct copy is attached as Exhibit D2. *See* Compl. ¶¶ 8–9.

**22. NIF 2016 Form 990:** New Israel Fund’s Form 990 for tax year 2016. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/01\\_2018\\_prefi\\_xes\\_92-94%2F942607722\\_201612\\_990\\_2018010415084429](https://projects.propublica.org/nonprofits/display_990/942607722/01_2018_prefi_xes_92-94%2F942607722_201612_990_2018010415084429)

and a true and correct copy is attached as Exhibit D3. *See* Compl. ¶ 10.

**23. NIF 2015 Form 990:** New Israel Fund’s Form 990 for tax year 2015. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/01\\_2017\\_prefi\\_xes\\_93-95%2F942607722\\_201512\\_990\\_2017011814088029](https://projects.propublica.org/nonprofits/display_990/942607722/01_2017_prefi_xes_93-95%2F942607722_201512_990_2017011814088029)

and a true and correct copy is attached as Exhibit D4. *See* Compl. ¶ 11.

**24. NIF 2014 Form 990:** New Israel Fund’s Form 990 for tax year 2014. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2015\\_10\\_EO%2F94-2607722\\_990\\_201412](https://projects.propublica.org/nonprofits/display_990/942607722/2015_10_EO%2F94-2607722_990_201412)



and a true and correct copy is attached as Exhibit D5. *See* Compl. ¶ 12.

**25. NIF 2013 Form 990:** New Israel Fund's Form 990 for tax year 2013. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2014\\_11\\_EO%2F94-2607722\\_990\\_201312](https://projects.propublica.org/nonprofits/display_990/942607722/2014_11_EO%2F94-2607722_990_201312)

and a true and correct copy is attached as Exhibit D6. *See* Compl. ¶ 13.

**26. NIF 2012 Form 990:** New Israel Fund's Form 990 for tax year 2012. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2013\\_12\\_EO%2F94-2607722\\_990\\_201212](https://projects.propublica.org/nonprofits/display_990/942607722/2013_12_EO%2F94-2607722_990_201212)

and a true and correct copy is attached as Exhibit D7. *See* Compl. ¶ 14.

**27. NIF 2011 Form 990:** New Israel Fund's Form 990 for tax year 2011. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2012\\_11\\_EO%2F94-2607722\\_990\\_201112](https://projects.propublica.org/nonprofits/display_990/942607722/2012_11_EO%2F94-2607722_990_201112)

and a true and correct copy is attached as Exhibit D8. *See* Compl. ¶ 15.

**28. NIF 2010 Form 990:** New Israel Fund's Form 990 for tax year 2010. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2011\\_11\\_EO%2F94-2607722\\_990\\_201012](https://projects.propublica.org/nonprofits/display_990/942607722/2011_11_EO%2F94-2607722_990_201012)

and a true and correct copy is attached as Exhibit D9. *See* Compl. ¶ 16.

**29. NIF 2009 Form 990:** New Israel Fund’s Form 990 for tax year 2009. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2010\\_12\\_EO%2F94-2607722\\_990\\_200912](https://projects.propublica.org/nonprofits/display_990/942607722/2010_12_EO%2F94-2607722_990_200912)

and a true and correct copy is attached as Exhibit D10. *See* Compl. ¶ 17.

**30. NIF 2008 Form 990:** New Israel Fund’s Form 990 for tax year 2008. In addition to being available through the NIF website (*see* Ex. A1) the document is available for viewing and download at

[https://projects.propublica.org/nonprofits/display\\_990/942607722/2009\\_12\\_EO%2F94-2607722\\_990\\_200812](https://projects.propublica.org/nonprofits/display_990/942607722/2009_12_EO%2F94-2607722_990_200812)

and a true and correct copy is attached as Exhibit D11. *See* Compl. ¶ 18.

### **“E” Exhibits**

**31. NGO Monitor Profile:** An online profile on NIF maintained by the watchdog group “NGO Monitor.” The page is available at

[https://www.ngo-monitor.org/funder/new\\_israel\\_fund/](https://www.ngo-monitor.org/funder/new_israel_fund/)

A true and correct copy of the page is attached as Exhibit E1. *See* Compl. ¶¶ 8–19 (Form 990s); *id.* ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**32.** An article by NGO Monitor entitled *Analysis of NIF 2018 Funding for 31 Political Advocacy NGOs* (August 7, 2019), available at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2018-funding-for-31-political-advocacy-ngos/>

a true and correct copy of which is attached as Exhibit E2. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**33.** An article by NGO Monitor entitled *Analysis of NIF 2017 Funding for 30 Political Advocacy NGOs* (July 16, 2018), available at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2017-funding-for-30-political-advocacy-ngos/>

a true and correct copy of which is attached as Exhibit E3. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**34.** An article by NGO Monitor entitled *Analysis of NIF 2016 Funding for 29 Political Advocacy NGOs* (April 15, 2018), available at

<https://www.ngo-monitor.org/reports/nif-2016-funding-for-political-ngos/>

a true and correct copy of which is attached as Exhibit E4. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**35.** An article by NGO Monitor entitled *Analysis of NIF 2015 Funding for 25 Political Advocacy NGOs* (August 1, 2016), available at

<https://www.ngo-monitor.org/reports/analysis-of-nif-2015-funding-for-25-political-advocacy-ngos/>

a true and correct copy of which is attached as Exhibit E5. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**36.** An article by NGO Monitor entitled *NIF Grants 2014: Few Changes in Demonization Funding* (August 20, 2015), available at

[https://www.ngo-monitor.org/reports/changes\\_in\\_nif\\_grants\\_few\\_changes\\_in\\_demonization\\_funding/](https://www.ngo-monitor.org/reports/changes_in_nif_grants_few_changes_in_demonization_funding/)

A true and correct copy of the document is attached as Exhibit E6. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**37.** An article by NGO Monitor entitled *Changes in NIF Grants 2013* (June 23, 2014), available at

[https://www.ngo-monitor.org/reports/changes\\_in\\_nif\\_grants\\_/](https://www.ngo-monitor.org/reports/changes_in_nif_grants_/)

A true and correct copy of the document is attached as Exhibit E7. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**38.** An article by NGO Monitor entitled *Update on New Israel Fund (NIF) April 2012* (April 30, 2012), available at

[https://www.ngo-monitor.org/reports/update\\_on\\_new\\_israel\\_fund\\_nif\\_april\\_/](https://www.ngo-monitor.org/reports/update_on_new_israel_fund_nif_april_/)

A true and correct copy of the document is attached as Exhibit E8. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**39.** An article by NGO Monitor entitled *NIF 2011 Funding: One Step Forward, One Step Back* (August 31, 2012), available at

[https://www.ngo-monitor.org/reports/nif\\_funding\\_one\\_step\\_forward\\_one\\_step\\_back/](https://www.ngo-monitor.org/reports/nif_funding_one_step_forward_one_step_back/)

A true and correct copy of the document is attached as Exhibit E9. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

**40.** An article by NGO Monitor entitled *Changes in NIF Funding 2010 Grants* (September 7, 2011), available at

[https://www.ngo-monitor.org/reports/changes\\_in\\_nif\\_funding\\_grants/](https://www.ngo-monitor.org/reports/changes_in_nif_funding_grants/)

A true and correct copy of the document is attached as Exhibit E10. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

41. An article by NGO Monitor entitled *NIF 2010 Financial Report: CWP Continued to Receive Funds, Despite Denials* (July 31, 2011), available at

[https://www.ngo-monitor.org/reports/nif\\_financial\\_report\\_cwp\\_continued\\_to\\_receive\\_funds\\_despite\\_denials](https://www.ngo-monitor.org/reports/nif_financial_report_cwp_continued_to_receive_funds_despite_denials)

a true and correct copy of which is attached as Exhibit E11. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

42. An online profile on Mossawa maintained by the watchdog group “NGO Monitor,” which republishes via hyperlink NIF’s annual financial reports from the years 2008 to 2013, among others. The page is available at

<https://www.ngo-monitor.org/ngos/mossawa/#funding>

and a true and correct copy of the page is attached as Exhibit E12. *See* Compl. ¶¶ 22, 24, 26–28, 30–32 (NIF grants).

### **“F” Exhibit**

43. An article in the Israeli newspaper Haaretz regarding the actions of Zazim: Community Action alleged in the complaint. The article is available at

<https://www.haaretz.com/us-news/.premium-u-s-jewish-groups-condemn-decision-not-to-ban-far-right-party-from-israeli-election-1.6999774>

and a true and correct copy is attached as Exhibit F. *See* Compl. ¶ 23.

### **“G” Exhibits**

44. An article published by Israel Hayom regarding the actions of IRAC alleged in the complaint. The article is available at

<https://www.israelhayom.com/2019/08/14/a-g-recommends-central-election-committee-disqualify-2-far-right-candidates/>

and a true and correct copy is attached as Exhibit G1. *See* Compl. ¶ 24.

45. An article published in i24 News regarding the actions of IRAC alleged in the complaint. The article is available at

<https://www.i24news.tv/en/news/israel/politics/1566458428-israel-s-supreme-court-discusses-petition-to-disqualify-far-right-party-to-run-for-parliament>

and a true and correct copy is attached as Exhibit G2. *See* Compl. ¶ 24.

46. An article published by The Times of Israel regarding the actions of IRAC alleged in the complaint. The article is available at

<https://www.timesofisrael.com/supreme-court-says-arab-mk-far-right-activist-can-run-for-knesset/>

and a true and correct copy is attached as Exhibit G3. *See* Compl. ¶ 25.

#### **“H” Exhibit**

47. An article published by The Times of Israel Blog regarding the actions of Tag Meir Forum alleged in the complaint. The article is available at

<https://blogs.timesofisrael.com/renouncing-religious-racism-and-political-extremism-in-israel/>

and a true and correct copy is attached as Exhibit H. *See* Compl. ¶ 26.

#### **“I” Exhibits**

48. An article published by YNet News.com regarding the actions of Adalah alleged in the complaint. The article is available at

<https://www.ynetnews.com/articles/0,7340,L-4326059,00.html>

and a true and correct copy is attached as Exhibit I1. *See* Compl. ¶ 28.

49. An article published by The Arab Daily News regarding the actions of Adalah alleged in the complaint. The article is available at

<https://thearabdailynews.com/2019/08/13/racist-israel-group-tries-to-block-arabs-from-running-for-knesset/>

and a true and correct copy is attached as Exhibit I2. *See* Compl. ¶ 29.

**50.** An article published in the Israeli newspaper Haaretz regarding the actions of Adalah alleged in the complaint. The article is available at

<https://www.haaretz.com/.premium-hanin-zuabi-not-here-to-be-loved-1.5288090?v=1591129366194>

and a true and correct copy is attached as Exhibit I3. *See* Compl. ¶ 28.

**51.** An article published in the Middle East Eye regarding the actions of Adalah alleged in the complaint. The article is available at

<https://www.middleeasteye.net/news/israeli-supreme-court-overturns-election-ban-haneen-zoabi>

and a true and correct copy is attached as Exhibit I4. *See* Compl. ¶ 28.

**52.** An article published in The Jerusalem Post regarding the actions of Adalah alleged in the complaint. The article is available at

<https://www.jpost.com/israel-elections/high-court-hears-petition-to-disqualify-two-israeli-arab-parties-583312>

and a true and correct copy is attached as Exhibit I5. *See* Compl. ¶ 29.

### **“J” Exhibits**

**53.** An issue of the Mossawa Center newsletter regarding the actions of Mossawa alleged in the complaint. The issue is available at

<http://www.mossawa.org/eng//Public/file/1November%202018%20-%20The%20Mossawa%20Center.pdf>

and a true and correct copy is attached as Exhibit J1. *See* Compl. ¶ 30.

**54.** An article on the Mossawa Center website regarding the actions of Mossawa alleged in the complaint. The article is available at

<http://www.mossawa.org/eng/?mod=articles&ID=818>

and a true and correct copy is attached as Exhibit J2. *See* Compl. ¶ 30.

**55.** An article on the Mossawa Center website regarding the actions of Mossawa alleged in the complaint. The article is available at

<http://www.mossawa.org/eng/?mod=articles&ID=796>

and a true and correct copy is attached as Exhibit J3. *See* Compl. ¶ 30.

**56.** An article by Mossawa's sister organization, Friends of Mossawa, republishing newsletter reports of actions of Mossawa alleged in the complaint. The article is available at

<https://www.friendsofmossawa.org/post/the-likud-partys-attempts-to-repress-the-arab-vote-are-temporarily-thwarted>

and a true and correct copy is attached as Exhibit J4. *See* Compl. ¶ 30.

#### **“K” Exhibit**

**57.** A Facebook post of IRAC incorporated by reference in the complaint. The post is available at

[https://www.facebook.com/IsraelIRAC/photos/a.136134053907/10153059111933908/?type=3&eid=ARATtJnziDGFwFP76R1opW34UmVuosoT-SrrGIA5ujGHs1bLMAYvu2BKExwiqBZ7TdtOkG2uH7YDh9sb&\\_tn=EHH-R](https://www.facebook.com/IsraelIRAC/photos/a.136134053907/10153059111933908/?type=3&eid=ARATtJnziDGFwFP76R1opW34UmVuosoT-SrrGIA5ujGHs1bLMAYvu2BKExwiqBZ7TdtOkG2uH7YDh9sb&_tn=EHH-R)

and a true and correct copy is attached as Exhibit K1. *See* Compl. ¶ 25[-2].

Executed on June 26, 2020

/s/ J. Emmett Murphy

J. Emmett Murphy